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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SANTA ROSA DIVISION**

In re:

LEFEVER MATTSON, a California
corporation, *et al.*,¹

Debtors.

Case No.: 24-10545

(Jointly Administered)

Chapter 11

***EX PARTE APPLICATION OF THE
OFFICIAL COMMITTEE OF UNSECURED
CREDITORS FOR ENTRY OF AN ORDER
PURSUANT TO BANKRUPTCY RULE 2004
AUTHORIZING ORAL EXAMINATION OF
AND PRODUCTION OF DOCUMENTS BY
KENNETH MATTSON.; DECLARATION
OF STEVEN W. GOLDEN, ESQ.***

¹ The last four digits of LeFever Mattson's tax identification number are 7537. Due to the large number of debtor entities in the above-captioned chapter 11 cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://veritaglobal.net/LM>. The address for service on the Debtors is 6359 Auburn Blvd., Suite B, Citrus Heights, CA 95621.

The Official Committee of Unsecured Creditors (the “Committee”) appointed in the above-captioned chapter 11 bankruptcy cases (the “Cases”) hereby files this *ex parte* application (the “Application”) under Federal Rule of Bankruptcy Procedure 2004 (“Rule 2004”) and Local Bankruptcy Rule 2004-1 (“Local Rule 2004-1”) for entry of an order authorizing the Committee to issue a subpoena to **Kenneth Mattson**.

The Committee’s proposed subpoena will provide that Mr. Mattson shall (a) complete his production, by **May 14, 2025**, of documents responsive to the Requests for Production (the “Requests”) set forth substantially in the form attached hereto as **Exhibit 1**, and (b) provide oral testimony (the “Oral Testimony”), on a mutually agreed date no later than **June 25, 2025** (unless the Committee and Mr. Mattson agree to extend that date) relating to (i) Mr. Mattson’s search for and possession, custody, or control of documents responsive to the Requests; and (ii) the subject matter of the Requests.

I. PRELIMINARY STATEMENT

As set forth in the First-Day Declaration of Bradley Sharp, the Debtors’ Chief Restructuring Officer, Mr. Mattson, one of the Debtors’ founders and former principals, “appears to have used LeFever Mattson to facilitate a years-long campaign of self-serving transactions, many of which were not recorded in the books and records of LeFever Mattson, the Debtor, or any of the other LPs or LLCs (collectively, the “Mattson Transactions”).”² The Committee’s professionals are conducting an investigation (the “Investigation”) into the Mattson Transactions (including the Mattson Interest Sales and Mattson Property Sales, each as defined in the First-Day Declaration), and other potential claims and causes of action that may be asserted against non-Debtors.

During the Investigation, the Committee has learned that the Debtors’ books and records lack information critical to these bankruptcy cases. As set forth in the Requests, that information may include emails and documents relating to the Debtors that may only be in Mr. Mattson’s possession,

² See Declaration of Bradley D. Sharp in Support of Chapter 11 Petitions and First Day Motions [Docket No. 5] (the “First-Day Decl.”), ¶ 27.

1 custody, or control. As but one example, the Committee has learned during its Investigation that Mr.
2 Mattson used a personal hotmail.com email address – not the LeFever Mattson email server and
3 email addresses that Debtor LeFever Mattson’s other employees used – to send and receive business
4 emails. As such, those emails are in Mr. Mattson’s possession, custody, or control.

5 The Committee does not know whether Mr. Mattson has possession of other information that
6 belongs to the Debtors. The Requests seek the answer to that question. The Requests are specifically
7 directed to documents about the business operations of the Debtors in this case, the real properties
8 that the Debtors alleged own or owned; Mr. Mattson’s own dealings vis-à-vis the Debtors and the
9 real properties; and his relationship with Socotra Capital, the hard money lender that the Committee
10 understands Mr. Mattson engaged to encumber real properties at the expense of the investors who,
11 based on the filed proofs of claim and interest, constitute a majority of the Committee’s
12 constituency.

13 Counsel for the Committee provided a draft of the Requests to Mr. Mattson’s counsel on
14 March 25, 2025 in order to begin a meet and confer process to clarify questions and smooth the path
15 for Mr. Mattson’s document production. The Committee has not received any response as of the date
16 hereof.

17 II. FACTUAL BACKGROUND

18 Over the course of two months in 2024,³ each of the Debtors filed a voluntary petition for
19 relief in this Court under chapter 11 of the Bankruptcy Code. The United States Trustee appointed
20 the Committee on October 9, 2024.⁴ On November 1, 2024, the Court granted the Committee’s
21 application to employ Pachulski Stang Ziehl & Jones LLP as its counsel, effective as of October 13,
22 2024.⁵ On November 22, 2024, Debtor LeFever Mattson filed an involuntary chapter 11 petition
23

24
25 ³ The Debtors filed bankruptcy petitions on August 6, 2024; September 12, 2024; and October 2, 2024 (collectively, the
“Petition Dates”).

26 ⁴ See Docket No. 135.

27 ⁵ See Docket No. 250.

1 against Mr. Mattson, commencing Case No. 24-10714 in this Court (the “Mattson Bankruptcy
2 Case”).

3 **III. JURISDICTION**

4 This Court has subject matter jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157
5 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue is proper before this
6 Court pursuant to 28 U.S.C. §§ 1408 and 1409. The statutory predicates for the relief sought herein
7 are §§ 1103 and 1109(b) of the Bankruptcy Code, and Rule 2004.

8 **IV. RELIEF REQUESTED**

9 The Committee respectfully requests that the Court enter an *ex parte* order authorizing the
10 Committee to issue a subpoena requiring Mr. Mattson to (a) complete his production, by **May 14,**
11 **2025**, of documents responsive to the Requests set forth substantially in the form attached hereto as
12 **Exhibit 1**, and (b) provide Oral Testimony, on a mutually agreed date no later than **June 25, 2025**
13 (unless the Committee and Mr. Mattson agree to extend that date) relating to (i) Mr. Mattson’s
14 search for and possession, custody, or control of documents responsive to the Requests; and (ii) the
15 subject matter of the Requests.

16 **IV. BASIS FOR RELIEF**

17 Local Rule 2004-1 provides as follows: “The Clerk may issue on behalf of the Court, *ex*
18 *parte* and without notice, orders granting applications for examination of an entity pursuant to
19 Bankruptcy Rule 2004(a).”⁶ The Committee brings this Application *ex parte* pursuant to Local Rule
20 2004-1 seeking an order without need for a hearing.

21 Rule 2004(a) provides that “[o]n motion of any party in interest, the court may order the
22 examination of any entity.”⁷ Rule 2004 is primarily used for “revealing the nature and extent of the
23
24

25 _____
26 ⁶ L.B.R. 2004-1(a).

27 ⁷ Fed. R. Civ. P. 2004(a).

1 bankruptcy estate, and for discovering assets, examining transactions, and determining whether
2 wrongdoing has occurred.”⁸

3 Pursuant to Rule 2004(b), a party in interest may seek both document and oral discovery
4 related to “acts, conduct, or property or to the liabilities and financial condition of the debtor, or to
5 any matter which may affect the administration of the debtor’s estate, or to the debtor’s right to a
6 discharge.”⁹ Under Rule 2004(c), the “attendance of an entity for examination and for the production
7 of documents . . . may be compelled as provided in Rule 9016 for the attendance of a witness at a
8 hearing or trial.”¹⁰ Federal Rule of Bankruptcy Procedure (“Bankruptcy Rule”) 9016 makes Rule 45
9 of the Federal Rules of Civil Procedure (governing subpoenas) applicable in cases under the
10 Bankruptcy Code. Unlike discovery under the Federal Rules of Civil Procedure (the “Civil Rules”),
11 discovery under Rule 2004 can be a “pre-litigation discovery device.”¹¹ As such, a Rule 2004 motion
12 need not be tied to specific factual allegations at issue between parties.¹² Moreover, the scope of a
13 Rule 2004 oral examination is broader than that of discovery under the Civil Rules or the Bankruptcy
14 Rules governing adversary proceedings.¹³ In fact, courts have recognized that Rule 2004

18 ⁸ *In re Kelton*, 389 B.R. 812, 820 (Bankr. S.D. Ga. 2008); *see also In re Lufkin*, 255 B.R. 204, 208 (Bankr. E.D. Tenn.
19 2000) (purpose of Rule 2004 is to “determine the condition, extent, and location of the debtor’s estate in order to
20 maximize distribution to unsecured creditors”); *In re Bennett Funding Grp., Inc.*, 203 B.R. 24, 28 (Bankr. N.D.N.Y. 1996)
(purpose of Rule 2004 is to assist in “revealing the nature and extent of the estate, and to discover assets of the debtor
21 which may have been intentionally or unintentionally concealed”).

22 ⁹ Fed. R. Civ. P. 2004(b).

23 ¹⁰ Fed. R. Civ. P. 2004(c).

24 ¹¹ *In re Wilson*, 413 B.R. 330, 336 (Bankr. E.D. La. 2009).

25 ¹² *In re Symington*, 209 B.R. 678, 683 (Bankr. D. Md. 1997) (Bankruptcy Rule 2004 permits “examination of any party
without the requirement of a pending adversary proceeding or contested matter”).

26 ¹³ *In re Ecam Publ’ns, Inc.*, 131 B.R. 556, 559 (Bankr. S.D.N.Y. 1991); *see also In re Drexel Burnham Lambert Grp.,*
27 *Inc.*, 123 B.R. 702, 711 (Bankr. S.D.N.Y. 1991) (“[T]he scope of a Rule 2004 examination is very broad. Rule 2004
discovery is broader than discovery under the Federal Rules of Civil Procedure.”).

1 examinations may be “broad” and “unfettered,” and can legitimately be in the nature of a “fishing
2 expedition.”¹⁴

3 Whether to allow the requested discovery rests within the sound discretion of the Court.¹⁵
4 Bankruptcy courts may allow a Rule 2004 examination of “third parties who have had dealings with
5 the debtor,”¹⁶ “to allow inquiry into the debtor’s acts, conduct or financial affairs so as to discover the
6 existence or location of assets of the estate,”¹⁷ “unearthing frauds,”¹⁸ or to assist in recovering assets
7 for the benefit of a debtor’s creditors.¹⁹

8 In addition, section 105(a) of the Bankruptcy Code authorizes the Court to “issue any
9 order . . . that is necessary or appropriate to carry out the provisions of this title.”²⁰ The proposed
10 discovery will, among other things, assist the Committee to fulfill its statutory duty to “investigate the
11 acts, conduct, assets, liabilities, and financial condition of the debtor.”²¹ The relief requested in this
12 Application will not reduce or expand the substantive rights of any party to object to or modify the
13 information requested by the Committee.

14
15 ¹⁴ *In re Subpoena Duces Tecum & Ad Testificandum Pursuant to Fed. R. Bankr. P. 2004*, 461 B.R. 823, 829 (Bankr. C.D.
16 Cal. 2011) (citation omitted); *see also In re Countrywide Home Loans, Inc.*, 384 B.R. 373, 400 (Bankr. W.D. Pa. 2008); *In*
17 *re Bennett Funding Grp.*, 203 B.R. at 28 (purpose of Rule 2004 is to assist in “revealing the nature and extent of the estate,
18 and to discover assets of the debtor which may have been intentionally or unintentionally concealed”); *In re Valley Forge*
19 *Plaza Assocs.*, 109 B.R. 669, 674 (Bankr. E.D. Pa. 1990).

20 ¹⁵ *See, e.g., In re Hammond*, 140 B.R. 197, 200 (S.D. Ohio 1992).

21 ¹⁶ *In re Fearn*, 96 B.R. 135, 138 (Bankr. S.D. Ohio 1989); *see also In re W&S Invs., Inc.*, No. 91-35830, 1993 U.S. App.
LEXIS 2231, at *5-6 (9th Cir. Jan. 28, 1993) (unpublished disposition) (Rule 2004 is a “broadly construed discovery
device which permits any party in interest in a bankruptcy proceeding to move for a court order to examine any entity...,”
the “scope of inquiry permitted under a Rule 2004 examination is generally very broad and can ‘legitimately be in the
nature of a ‘fishing expedition.’”) (citation omitted).

22 ¹⁷ *In re Dinubilo*, 177 B.R. 932, 940 (E.D. Cal. 1993).

23 ¹⁸ *Dynamic Fin. Corp. v. Kipperman (In re N. Plaza, LLC)*, 395 B.R. 113, 122 n.9 (S.D. Cal. 2008) (citations omitted).

24 ¹⁹ *See In re Vantage Petroleum Corp.*, 34 B.R. 650, 651 (Bankr. E.D.N.Y. 1983) (allowing discovery under Rule 2004 to
25 help the debtor “discover and recover assets for benefit of creditors of the debtor”).

26 ²⁰ 11 U.S.C. § 105(a).

27 ²¹ *Id.* § 1103(c)(2).

1 Here, the requested relief is well within the scope of Rule 2004. The Committee seeks to
2 exercise its fiduciary duties to represent all of the unsecured creditors in these Cases, which
3 necessarily requires identifying all of those unsecured creditors. The Committee also seeks maximize
4 the amount of creditors' recoveries in this Cases. As such, the Committee needs the information from
5 Mr. Mattson pertaining to the and the Debtors' operations, assets, liabilities, and the Committee's
6 potential claims for relief.

7 The Committee's Application seeking to take Rule 2004 discovery of Mr. Mattson will not
8 constitute a violation of the automatic stay in the Mattson Bankruptcy Case because the
9 contemplated discovery is analogous to discovery sought from a debtor in its capacity as a non-party
10 witness and courts have held that the automatic stay does not bar the pursuit of discovery from a
11 debtor under those circumstances. *See Groner v. Miller (In re Miller)*, 262 B.R. 499, 505 (9th Cir.
12 BAP 2001) (finding automatic stay does not protect debtor from responding to third-party subpoena
13 issued by plaintiff in case that was stayed against the debtor but was proceeding against the debtor's
14 codefendant; this is so "even if that information could later be used against the party protected by the
15 automatic stay."); *Kenoyer v. Cardinale (In re Kenoyer)*, 489 B.R. 103, 121-22 (Bankr. N.D. Cal.
16 2013) ("generally accepted view is that §362(a) does not prevent third-party discovery from a debtor
17 which is directed to the claims asserted against non-debtor parties."); *see also In re Yafet Alem*, 2013
18 Bankr. LEXIS 3771 at *11 (Bankr. D.C. Sept. 11, 2013) (noting automatic stay does not apply to
19 discovery sought from debtor in the debtor's capacity as a non-party witness with information
20 relevant to the defenses asserted by the movants as to claims asserted against them in state court
21 action stayed against the debtor and proceeding against his co-defendants).

22 Here, the Committee is not seeking discovery against Mr. Mattson in order to prosecute
23 claims in an action against him. Rather, in accordance with its statutory mandate, the Committee
24 seeks information regarding the "acts, conduct, or property or to the liabilities and financial
25 condition of" the Debtors in this case. Fed. R. Bankr. P. 2004. The Committee's requests for
26 documents and testimony to that end in *this* bankruptcy case are not violations of the automatic stay
27 in the Mattson Bankruptcy Case.

V. **NO PRIOR REQUEST**

No prior request for the relief sought in this Application has been made to this or any other Court.

VI. **NOTICE**

Local Rule 2004-1 provides that this Application can be brought “ex parte and without notice.” L.B.R. 2004-1(a). Nevertheless, notice of this Application will be provided to (a) Mr. Mattson’s counsel of record in this case at Fennemore LLP -via ECF; (b) the Office of the United States Trustee – via ECF; (c) counsel to the Debtors -via ECF; and (d) all other ECF recipients.

VII. **CONCLUSION**

For the reasons set forth above, the Committee respectfully requests that the Court grant this Application. A proposed order granting this Application is attached hereto as **Exhibit 3**.

Dated: April 1, 2025

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/s/ Steven W. Golden

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Counsel to the Official Committee of Unsecured Creditors

EXHIBIT 1
Requests for Production of Documents

PACHULSKI STANG ZIEHL & JONES LLP
ATTORNEYS AT LAW
SAN FRANCISCO, CALIFORNIA

4896-3797-7647.1 52011.00002

DEFINITIONS

1. “AFFILIATE” shall have the meaning ascribed to such term in 11 U.S.C. § 101(2).
2. “ALL” shall be construed as encompassing “EACH” and “ANY”.
3. “ANY” shall be construed as encompassing “EACH” and “ALL”.
4. “CHAPTER 11 CASES” means those certain jointly-administered cases proceeding in the United States Bankruptcy Court for the Northern District of California under the caption *In re LeFever Mattson*, Case No. 24-10545.
5. “COMMITTEE” means the Official Committee of Unsecured Creditors appointed in the CHAPTER 11 CASES.
6. “COMMUNICATION” means the transmittal of information (in the form of facts, ideas, inquiries, or otherwise).
7. “CONCERNING” means relating to, evidencing, supporting, negating, refuting, embodying, containing, memorializing, comprising, reflecting, analyzing, approving, authorizing, constituting, describing, identifying, referring to, referencing, discussing, indicating, connected with or otherwise pertaining in ANY way, in whole or in part, to the subject matter being referenced.
8. “DEBTORS” means, individually and collectively, EACH of the ENTITIES listed on Appendix 1 hereto, and EACH of their agents, accountants, financial advisors, attorneys, employees, officers, directors, direct or indirect shareholders, members, representatives, affiliates, subsidiaries, predecessors, and/or successors.
9. “DOCUMENT” is synonymous in meaning and equal in scope to the usage of the term “documents or electronically stored information” in Federal Rule of Civil Procedure 34(a)(1)(A). A draft or non-identical copy is a separate DOCUMENT within the meaning of the word DOCUMENT. A DOCUMENT includes written COMMUNICATIONS.

10. “EACH” shall be construed as encompassing “ALL” and “ANY”.

11. “ENTITY” shall have the meaning ascribed to such term in 11 U.S.C. § 101(15).

12. “FIRST DAY DECLARATION” means that certain *Declaration of Bradley D. Sharp in Support of Chapter 11 Petitions and First Day Motions*, filed at docket number 5 in the CHAPTER 11 CASES.

13. “GOVERNMENTAL UNIT” shall have the meaning ascribed to it in 11 U.S.C. § 101(27).

14. “IDENTIFIED DOCUMENT” means ANY DOCUMENT identified on the attached Appendix 4, INCLUDING any amendment, restatement, amendment and restatement, addendum, modification, or other similar DOCUMENT thereto.

15. “IDENTIFIED ENTITY” means ANY ENTITY identified on the attached Appendix 3 and such IDENTIFIED ENTITY’s agents, accountants, financial advisors, attorneys, employees, officers, directors, direct or indirect shareholders, members, partners, representatives, affiliates, subsidiaries, predecessors, and/or successors.

16. “IDENTIFIED PROPERTY” means ANY real property identified on the attached Appendix 2.

17. “INCLUDING” means “including, without limitation” and “including, but not limited to”.

18. “KSMP” means KS Mattson Partners, LP and its agents, accountants, financial advisors, attorneys, employees, officers, directors, direct or indirect shareholders, partners, members, representatives, affiliates, subsidiaries, predecessors, and/or successors.

19. “LEFEVER” means Timothy LeFever and his agents, accountants, financial advisors, attorneys, employees, representatives, and/or family members.

20. “MATTSON” means Kenneth Mattson and his agents, accountants, financial advisors, attorneys, employees, representatives, and/or family members.

21. “REQUESTS” means the Requests for Production set forth below.

22. “SOCOTRA” means Socotra Capital, Inc. and its agents, accountants, financial advisors, attorneys, employees, officers, directors, direct or indirect shareholders, members, representatives, affiliates, subsidiaries, predecessors, and/or successors.

23. “SOCOTRA LOANS” shall have the meaning ascribed to it in the FIRST DAY DECLARATION.

24. “SPECIFIED PROPERTY” means ANY real property, INCLUDING the IDENTIFIED PROPERTIES, in which ANY of YOU, KSMP, LEFEVER, or the DEBTORS holds or at any time held an interest.

25. “YOU” and “YOUR” means MATTSON.

INSTRUCTIONS

A. Unless otherwise specified, the REQUESTS seek DOCUMENTS dated or created on and after January 1, 2010.

B. YOUR responses to the REQUESTS are subject to ALL applicable Federal Rules of Bankruptcy Procedure and this Court’s Local Rules.

C. Please bates number EACH page of EACH DOCUMENT that YOU produce.

D. YOU are required to conduct a thorough investigation and produce ALL DOCUMENTS in YOUR possession, custody, and control.

E. In the REQUEST, the use of the singular form of ANY word includes the plural and vice versa. The words “and” and “or” shall both be conjunctive and disjunctive.

F. If YOU are unable to produce DOCUMENTS responsive to ANY REQUEST but DOCUMENTS responsive to the REQUEST exist, provide a written DOCUMENT containing the following information:

1. The date of the DOCUMENT;
 2. The type of DOCUMENT (e.g., letter, memorandum, report, etc.);
 3. The name, address, telephone number and title of the author(s) of the DOCUMENT;
 4. The name, address, telephone number and work title of EACH recipient of the DOCUMENT;
 5. The number of pages in the DOCUMENT;
 6. The document control number, if ANY;
 7. The present location(s) of the DOCUMENT and the name, address and telephone number of the person(s) who has/have possession of the DOCUMENT;
 8. A specific description of the subject matter of the DOCUMENT;
 9. The reason why YOU cannot produce the DOCUMENT.
- G. YOU are under a continuing duty to amend YOUR written responses to the REQUESTS and to produce additional DOCUMENTS if the written responses or document production is incomplete or incorrect in ANY material respect, and if the additional or corrective information has not otherwise been made known to the COMMITTEE.
- H. YOU are required to produce the full and complete originals (in native format, if electronic), or copies if the originals are unavailable, of EACH DOCUMENT responsive to the REQUESTS along with ALL non-identical copies and drafts in their entirety. A copy may be produced in lieu of originals if the entirety (front and back where appropriate) of the DOCUMENT is reproduced and YOU state by declaration under penalty of perjury that the copy provided is a true, correct, complete, and accurate duplication of the original.
- I. Produced DOCUMENTS must include ALL exhibits, attachments, and ANY other DOCUMENTS otherwise appended to another DOCUMENT.
- J. For ELECTRONICALLY STORED INFORMATION (“ESI”):
1. Produce DOCUMENTS in accordance with the instructions at
<https://support.everlaw.com/hc/en-us/articles/360004962052-Standard-Format-for-Processed-Data>

2. Produce ESI in its native format.
 3. Maintain family integrity.
 4. Perform custodian-level de-duplication.
 5. Produce a DAT load file with the following metadata fields: Beginning Production Number, Ending Production Number, Beginning Attachment Number, End Attachment Number, Family ID, Page Count, Custodian, Original Location Path, Email Folder Path, Document Type, Doc Author, Doc Last Author, Comments, Categories, Revisions, File Name, File Size, MD5 Hash, Date Last Modified, Time Last Modified, Date Created, Time Created, Date Last Accessed, Time Last Accessed, Date Sent, Time Sent, Date Received, Time Received, To, From, CC, BCC, Email Subject, Path to Native, Path to Full Text, Original Time Zone.
 6. Process ESI in Pacific Time Zone and provide a metadata field indicating original time zone.
- K. If YOU withhold or redact a portion of ANY DOCUMENT under a claim of privilege or other protection, then the DOCUMENT must be identified on a privilege log, which shall be produced contemporaneously with the non-privileged DOCUMENTS responsive to this REQUEST, and which privilege log shall state the following information:
1. The date of the DOCUMENT;
 2. The type of DOCUMENT (e.g., letter, memorandum, report, etc.);
 3. The name, address, telephone number and title of the author(s) of the DOCUMENT;
 4. The name, address, telephone number and work title of EACH recipient of the DOCUMENT;
 5. The number of pages in the DOCUMENT;
 6. The document control number, if ANY;
 7. The present location(s) of the DOCUMENT and the name, address and telephone number of the person(s) who has/have possession, custody, or control of the DOCUMENT;

8. A general description of the subject matter of the DOCUMENT or the portion redacted without disclosing the asserted privileged or protected COMMUNICATION;

9. The specific privilege(s) or protection(s) that YOU contend applies.

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1:

ALL DOCUMENTS CONCERNING ANY of the DEBTORS listed on Appendix 1, attached, INCLUDING (a) ANY limited partnership agreement from 2000 to the present, INCLUDING ANY amendment, amendment and restatement, or iteration thereof, CONCERNING ANY of the DEBTORS; (b) ANY operating agreement from 2000 to the present, INCLUDING ANY amendment, amendment and restatement, or iteration thereof, CONCERNING ANY of the DEBTORS; (c) ANY contribution agreement CONCERNING ANY of the DEBTORS; (d) ANY plan of conversion CONCERNING ANY of the DEBTORS; (e) ANY written consent or other similar DOCUMENT from 2000 to the present CONCERNING ANY of the DEBTORS; (f) ANY agreements of transfer and purchase of partnership interest CONCERNING ANY of the DEBTORS; (g) ANY minutes of any board of directors, board of managers, or other similar governing body of ANY of the DEBTORS; and (h) ANY resolutions of any board of directors, board of managers, or other similar governing body of ANY of the DEBTORS.

REQUEST FOR PRODUCTION NO. 2:

ALL DOCUMENTS CONCERNING ANY SPECIFIED PROPERTY, INCLUDING the IDENTIFIED PROPERTIES listed on Appendix 2, attached, INCLUDING (a) ANY DOCUMENT CONCERNING the purchase of ANY SPECIFIED PROPERTY; (b) ANY DOCUMENT CONCERNING the sale of ANY SPECIFIED PROPERTY; (c) ANY closing statement CONCERNING ANY SPECIFIED PROPERTY; (d) ANY DOCUMENT CONCERNING a loan CONCERNING ANY SPECIFIED PROPERTY; (e) ANY change of ownership report

1 CONCERNING ANY SPECIFIED PROPERTY; (f) ANY COMMUNICATIONS CONCERNING
2 ANY SPECIFIED PROPERTY, INCLUDING such COMMUNICATIONS with investors in or
3 tenants-in-common with the DEBTORS, YOU, KSMP, and/or an IDENTIFIED ENTITY; (g) ANY
4 co-tenancy agreement CONCERNING ANY SPECIFIED PROPERTY; (h) ANY property
5 management agreement CONCERNING ANY SPECIFIED PROPERTY; (i) ANY contribution
6 agreement CONCERNING ANY SPECIFIED PROPERTY; AND (j) ANY agreements of transfer
7 and purchase of partnership interest CONCERNING ANY SPECIFIED PROPERTY.

8 **REQUEST FOR PRODUCTION NO. 3:**

9
10 ALL DOCUMENTS CONCERNING ANY of the IDENTIFIED ENTITIES listed on
11 Appendix 3, attached, INCLUDING (a) ANY limited partnership agreement from 2000 to the
12 present, INCLUDING ANY amendment, amendment and restatement, or iteration thereof,
13 CONCERNING ANY of the IDENTIFIED ENTITIES; (b) ANY operating agreement from 2000 to
14 the present, INCLUDING ANY amendment, amendment and restatement, or iteration thereof,
15 CONCERNING ANY of the IDENTIFIED ENTITIES; (c) ANY contribution agreement
16 CONCERNING ANY of the IDENTIFIED ENTITIES; (d) ANY plan of conversion
17 CONCERNING ANY of the IDENTIFIED ENTITIES; (e) ANY written consent or other similar
18 DOCUMENT from 2000 to the present CONCERNING ANY of the IDENTIFIED ENTITIES; (f)
19 ANY agreements of transfer and purchase of partnership interest CONCERNING ANY of the
20 IDENTIFIED ENTITIES; (g) ANY minutes of any board of directors, board of managers, or other
21 similar governing body of ANY of the IDENTIFIED ENTITIES; (h) ANY resolutions of any board
22 of directors, board of managers, or other similar governing body of ANY of the IDENTIFIED
23 ENTITIES; (i) ANY DOCUMENTS CONCERNING ANY of the IDENTIFIED ENTITIES
24 submitted to ANY GOVERNMENTAL UNIT, INCLUDING the California Secretary of State.

25 **REQUEST FOR PRODUCTION NO. 4:**

26 ALL DOCUMENTS BETWEEN YOU on the one hand, and ANY of the following, on the
27 other hand: (a) ANY DEBTOR; (b) LEFEVER; (c) SOCOTRA; (d) ANY investors in or tenants-in-

common with the DEBTORS; (e) ANY investors in or tenants-in-common with ANY MATTSON ENTITY; (f) ANY co-investors or tenants-in-common with YOU; AND (g) ANY IDENTIFIED ENTITY.

REQUEST FOR PRODUCTION NO. 5:

DOCUMENTS sufficient to identify ALL ENTITIES in which YOU hold ANY interest.

REQUEST FOR PRODUCTION NO. 6:

DOCUMENTS sufficient to identify ALL real property, INCLUDING the street address and APN of each such real property, in which YOU currently hold or formerly held any interest.

REQUEST FOR PRODUCTION NO. 7:

ALL IDENTIFIED DOCUMENTS.

REQUEST FOR PRODUCTION NO. 8:

ALL DOCUMENTS CONCERNING SOCOTRA, INCLUDING the SOCOTRA LOANS.

-end-

Appendix 1 – Debtors

Debtor Name	Petition Date	Tax ID	Case No.
Apan Partners LLC	9/12/2024	N/A	24-10487
Autumn Wood I, LP	9/12/2024	20-0164208	24-10488
Bay Tree, LP	9/12/2024	82-1071378	24-10489
Beach Pine, LP	9/12/2024	83-2643272	24-10490
Bishop Pine, LP	9/12/2024	83-2643038	24-10491
Black Walnut, LP	9/12/2024	47-2451858	24-10492
Buck Avenue Apartments, LP	9/12/2024	54-2090323	24-10493
Buckeye Tree, LP	9/12/2024	88-2980108	24-10494
Bur Oak, LP	9/12/2024	87-4699497	24-10495
Butcher Road Partners, LLC	9/12/2024	45-5159521	24-10496
California Investment Properties, a California corporation	9/12/2024	30-0289474	24-10543
Cambria Pine, LP	9/12/2024	83-2644771	24-10497
Chestnut Oak, LP	9/12/2024	87-4702239	24-10498
Country Oaks I, LP	9/12/2024	26-0860694	24-10499
Divi Divi Tree, L.P.	9/12/2024	71-0926806	24-10500
Douglas Fir Investments, LP	9/12/2024	47-4674444	24-10501
Firetree I, LP	9/12/2024	82-3519393	24-10502
Firetree II, LP	9/12/2024	82-3519554	24-10503
Firetree III, LP	9/12/2024	82-3919655	24-10504
Foxtail Pine, LP	9/12/2024	83-2643197	24-10505
Ginko Tree, LP	9/12/2024	88-2960976	24-10506
Golden Tree, LP	9/12/2024	82-1060045	24-10507

Debtor Name	Petition Date	Tax ID	Case No.
Hagar Properties, LP	9/12/2024	04-3598044	24-10508
Heacock Park Apartments, LP	9/12/2024	46-3737509	24-10509
Home Tax Service of America, Inc., dba LeFever Mattson Property Management	9/12/2024	68-0262554	24-10544
LeFever Mattson I, LLC	9/12/2024	47-4960075	24-10510
LeFever Mattson, a California corporation	9/12/2024	68-0197537	24-10545
Live Oak Investments, LP	9/12/2024	47-3786181	24-10511
Monterey Pine, LP	9/12/2024	83-2644824	24-10512
Napa Elm, LP	9/12/2024	54-2090332	24-10513
Nut Pine, LP	9/12/2024	83-2661795	24-10514
Pinecone, LP	9/12/2024	84-2395880	24-10515
Pinewood Condominiums, LP	10/2/2024	54-2090329	24-10598
Ponderosa Pines, LP	10/2/2024	N/A	24-10599
Red Cedar Tree, LP	9/12/2024	88-3572519	24-10517
Red Mulberry Tree, LP	9/12/2024	88-3572594	24-10518
Red Oak Tree, LP	9/12/2024	92-1008382	24-10520
Red Oak, LP	9/12/2024	61-2022650	24-10519
Red Spruce Tree, LP	9/12/2024	92-0780568	24-10521
Redbud Tree, LP	9/12/2024	88-2961999	24-10516
River Birch, LP	9/12/2024	86-3020630	24-10522
River Tree Partners, LP	9/12/2024	81-3671554	24-10523
River View Shopping Center 1, LLC	9/12/2024	47-4186147	24-10524
River View Shopping Center 2, LLC	9/12/2024	47-4186476	24-10525
RT Capitol Mall, LP	9/12/2024	81-3775896	24-10526

Debtor Name	Petition Date	Tax ID	Case No.
RT Golden Hills, LP	9/12/2024	81-3708073	24-10527
Scotch Pine, LP	9/12/2024	86-3043628	24-10528
Sequoia Investment Properties, LP	9/12/2024	32-0136044	24-10529
Sienna Pointe, LLC	9/12/2024	47-4712579	24-10530
Spruce Pine, LP	9/12/2024	84-2396399	24-10532
Tradewinds Apartments, LP	9/12/2024	54-2090326	24-10533
Vaca Villa Apartments, LP	9/12/2024	54-2090327	24-10534
Valley Oak Investments, LP	9/12/2024	47-3383417	24-10535
Watertree I, LP	9/12/2024	82-3519819	24-10536
Willow Oak, LP	9/12/2024	87-4700495	24-10537
Windscape Apartments I, LP	9/12/2024	26-0860477	24-10538
Windscape Apartments II, LP	9/12/2024	26-0860509	24-10539
Windscape Apartments, LLC	9/6/2024	83-1597353	24-10417
Windscape Holdings, LLC	9/12/2024	83-1608759	24-10540
Windtree, LP	9/12/2024	82-4974654	24-10541
Yellow Poplar, LP	9/12/2024	86-3043392	24-10542

Appendix 2 – Identified Properties

Address	City	State	APN (if known)
200 Wagner Road	Sonoma	CA	128-461-023-000
23570 Arnold Dr			128-461-081-000
72 Wagner Road			128-461-082-000
100 Wagner Road			128-461-084-000
450 West Spain	Sonoma	CA	018-111-042-000
302/304/310 1st Street East	Sonoma	CA	018-171-019-000 018-171-031-000
171 W. Spain Street	Sonoma	CA	018-202-051-000
103/105 Commerce Court	Fairfield	CA	0044-090-490-000 0044-090-500-000
9407-9471 N Fort Washington Rd	Fresno	CA	401-830-01 401-830-02 401-830-03 401-830-04 401-830-05 401-830-06 401-830-07 401-830-08 401-830-09 401-830-10
2151 Salvio Street	Concord	CA	112-137-017-3
941-1017 Alamo Dr.	Vacaville	CA	0127-080-570 0127-080-340
1870 Thornsberry Rd	Sonoma	CA	127-192-056-000
Vineyard 8th Street E	Sonoma	CA	128-422-075-000
802 Studley St	Sonoma	CA	018-443-011-000
801 W. Napa St	Sonoma	CA	018-443-011-000
830-848 Studley St	Sonoma	CA	018-443-022-000
921 Broadway	Sonoma	CA	128-082-011-000
1383 Larkin Drive	Sonoma	CA	023-040-028-000
635 Broadway	Sonoma	CA	018-301-010-000
645-651 Broadway/10 Maple St	Sonoma	CA	018-301-009-000
1161-1167 Broadway	Sonoma	CA	128-181-029-000
1151 Broadway	Sonoma	CA	128-181-028-000
596 3rd St E	Sonoma	CA	018-271-037-000
446 3rd Street West	Sonoma	CA	018-201-003-000
454 3rd Street West	Sonoma	CA	018-201-004-000
789 Cordilleras	Sonoma	CA	023-010-069-000
110 Fordham Circle	Vallejo	CA	0068-243-020

1	905 Broadway St	Fairfield	CA	0030-282-190
2	1621 Hood Rd	Sacramento	CA	285-0021-090-0000 285-0021-010-0000
3	5800 Engle Rd	Carmichael	CA	258-0180-043-0000
4	7575 Power Inn Rd	Sacramento	CA	051-0200-093 051-0467-052
5	7337 Power Inn Rd	Sacramento	CA	051-0231-014 051-0231-016 051-0231-015
6	1190 Dana Dr	Fairfield	CA	0033-042-400
7	1189 Dana Dr	Fairfield	CA	0033-042-300
8	1050 Elm St	Napa	CA	005-123-013-000
9	3310 Cimmarron Rd 3320 Cimmarron Rd 3336 Cimmarron Rd	Cameron Park	CA	116-311-001-000 116-311-002-000 116-311-003-000
10	500 Jackson St	Fairfield	CA	0030-244-130
11	501 - 523 Carpenter St; 1035 - 1037 Washington St	Fairfield	CA	0030-152-010
12	453 Fleming Ave E	Vallejo	CA	0069-222-010 0069-222-020
13	5800 Fair Oaks Blvd	Carmichael	CA	283-0050-034-0000
14	3217 Walnut Ave	Carmichael	CA	271-0313-030-000
15	170 - 182 1st Street East	Sonoma	CA	092-010-014-000 092-010-015-000
16	520 Capitol Mall	Sacramento	CA	006-146-031-000
17	6359 Auburn Blvd	Citrus Heights	CA	229-160-013-000
18	2280 Bates Ave	Concord	CA	159-070-015-700
19	19450 Old Winery Rd	Sonoma	CA	127-242-049-000
20	222-226 W. Spain St	Sonoma	CA	018-151-005-000
21	24265 Arnold Dr	Sonoma	CA	128-484-009-000
22	24321 Arnold Dr	Sonoma	CA	128-484-010-000
23	786 Broadway	Sonoma	CA	018-352-043-000
24	790 Broadway	Sonoma	CA	018-352-044-000
25	18580 Sonoma Highway	Sonoma	CA	056-501-059-000
26	453/457/459 2nd St W	Sonoma	CA	018-201-016-000
27	17700 Sonoma Highway	Sonoma	CA	056-303-025-000
28	1319-1361 Fulton Ave	Sacramento	CA	285-152-031-000
	377 West Spain Street	Sonoma	CA	018-192-028-000
	20564 Broadway	Sonoma	CA	128-321-008-000

4896-3797-7647.1 52011.00002

653 3rd Street W	Sonoma	CA	018-283-005-000
391-455 Oak Street; 19173 Railroad Ave	Sonoma	CA	052-402-022-000
19020 Railroad Ave. 19022 A&B Railroad Ave. 19030 Railroad Ave.	Sonoma	CA	052-351-028-000
8th St E	Sonoma	CA	128-381-027-000
21885 8th St E	Sonoma	CA	128-381-028-000
141-145 E. Napa Street	Sonoma	CA	018-261-006-000
151 E Napa Street	Sonoma	CA	018-261-023-000
241 1st Street West	Sonoma	CA	018-121-005-000
23250 Maffei Road	Sonoma	CA	128-461-009-000 128-471-012-000
20490 Broadway	Sonoma	CA	128-262-003-000
925-927 Broadway Street	Sonoma	CA	128-082-015-000
967 Broadway Street	Sonoma	CA	128-690-009-000
101 Meadowlark Lane	Sonoma	CA	128-484-013-000
24101 Arnold Drive	Sonoma	CA	128-484-003-000
24151 Arnold Drive	Sonoma	CA	128-484-024-000
310 Meadowlark	Sonoma	CA	128-484-014-000
201 Meadowlark	Sonoma	CA	128-484-033-000 128-484-034-000
16721 Sonoma Highway	Sonoma	CA	056-562-020-000
18585 Manzanita Road	Sonoma	CA	056-501-036-000
1130 Pear Tree Lane	Napa	CA	044-500-007-000
157 James River Road	Vallejo	CA	079-351-010-000
258 Lorraine Blvd.	San Leandro	CA	075-0171-013
533 Bella Vista Drive	Suisun City	CA	0174-234-200
5601 Walnut Avenue #4	Orangevale	CA	235-0420-053-0023
5701/5703 Orange Ave	Sacramento	CA	050-0411-002-0000
830 Illinois Street #1-4	Fairfield	CA	0030-312-100
1173 Araquipa Court	Vacaville	CA	0127-351-310
1191 Araquipa Court	Vacaville	CA	0127-351-340
1864 Quail Meadows Circle	Vacaville	CA	132-042-170-000
4920 Samo Lane	Fairfield	CA	0174-010-090
333 Wilkerson Ave.	Perris	CA	310-061-023
371 Wilkerson Ave.	Perris	CA	310-070-078

4896-3797-7647.1 52011.00002

1	411 Wilkerson Ave.	Perris	CA	310-081-012
2	No Address	Perris	CA	310-070-077
3	19340 7th St E	Sonoma	CA	127-242-025-000
4	101 Quail Court	Truckee	CA	107-170-033-000
5	102 Quail Court	Truckee	CA	107-170-032-000
6	103 Quail Court	Truckee	CA	107-170-034-000
7	104 Quail Court	Truckee	CA	107-170-031-000
8	107 Quail Court	Truckee	CA	107-170-035-000
9	108 Quail Court	Truckee	CA	107-170-030-000
10	109 Quail Court	Truckee	CA	107-170-036-000
11	10335 Badger Lane	Truckee	CA	107-170-037-000
12	10298 Badger Lane	Truckee	CA	107-170-001-000
13	10300 Badger Lane	Truckee	CA	107-170-002-000
14	10306 Badger Lane	Truckee	CA	107-170-003-000
15	10308 Badger Lane	Truckee	CA	107-170-004-000
16	10316 Badger Lane	Truckee	CA	107-170-005-000
17	10318 Badger Lane	Truckee	CA	107-170-006-000
18	10326 Badger Lane	Truckee	CA	107-170-007-000
19	10328 Badger Lane	Truckee	CA	107-170-008-000
20	10333 Badger Lane	Truckee	CA	107-170-038-000
21	10334 Badger Lane	Truckee	CA	107-170-009-000
22	110 Quail Court	Truckee	CA	107-170-029-000
23	10336 Badger Lane	Truckee	CA	107-170-010-000
24	10342 Badger Lane	Truckee	CA	107-170-011-000
25	10344 Badger Lane	Truckee	CA	107-170-012-000
26	10350 Badger Lane	Truckee	CA	107-170-013-000
27	10352 Badger Lane	Truckee	CA	107-170-014-000
28	10358 Badger Lane	Truckee	CA	107-170-015-000
	10360 Badger Lane	Truckee	CA	107-170-016-000
	10366 Badger Lane	Truckee	CA	107-170-017-000
	10368 Badger Lane	Truckee	CA	107-170-018-000
	10378 Badger Lane	Truckee	CA	107-170-019-000
	10379 Badger Lane	Truckee	CA	107-170-028-000
	10380 Badger Lane	Truckee	CA	107-170-020-000
	10381 Badger Lane	Truckee	CA	107-170-027-000
	10386 Badger Lane	Truckee	CA	107-170-021-000
	10388 Badger Lane	Truckee	CA	107-170-022-000

4896-3797-7647.1 52011.00002

1	10393 Badger Lane	Truckee	CA	107-170-026-000
2	10394 Badger Lane	Truckee	CA	107-170-023-000
3	10395 Badger Lane	Truckee	CA	107-170-025-000
4	10396 Badger Lane	Truckee	CA	107-170-024-000
5	Pinyon Creek Common Area	Truckee	CA	107-170-039-000 107-170-040-000 107-170-041-000
6	2030 E Grayson Rd	Ceres	CA	041-032-023-000
7	9120 Polhemus Drive/9300 Mazatlan Way	Elk Grove	CA	125-0203-016-0000
8	7210/7212 Grady Drive	Citrus Heights	CA	243-0311-020-0000
9	7300 Berna/7325 Arleta	Sacramento	CA	050-0412-004-0000
10	7303/7305 Berna Way	Sacramento	CA	050-0411-009-0000
11	7304/7306 Arleta Court	Sacramento	CA	050-0411-014-0000
12	7308/7310 Arleta Court	Sacramento	CA	050-0411-015-0000
13	7312/7314 Berna Way	Sacramento	CA	050-0412-007-0000
14	7316/7318 Arleta Court	Sacramento	CA	050-0411-017-0000
15	7319 Arleta/7301 Berna	Sacramento	CA	050-0411-005-0000
16	7320/7322 Arleta Court	Sacramento	CA	050-0411-018-0000
17	7319/7321 Berna Way	Sacramento	CA	050-0411-005-0000
18	7324/7326 Arleta Court	Sacramento	CA	050-0411-019-0000
19	7327/7329 Berna Way	Sacramento	CA	050-0411-003-0000
20	7328/7330 Arleta Court	Sacramento	CA	050-0411-020-0000
21	7332/7334 Arleta Court	Sacramento	CA	050-0411-021-0000
22	7339/7341 Arleta Court	Sacramento	CA	050-0412-002-0000
23	6346/6348 Sorrell Court	Citrus Heights	CA	209-0380-032-0000
24	5509 Orange Ave/7343 Arleta	Sacramento	CA	050-0412-001-0000
25	5513/5515 Missie Way	Sacramento	CA	228-0520-015-0000
26	5521/5523 Missie Way	Sacramento	CA	228-0520-017-0000
27	5335/5337 Gibbons Drive	Carmichael	CA	258-0191-033-0000
28	5537/5539 Missie Way	Sacramento	CA	228-0520-021-0000
	5605 Orange Avenue/7320 Berna Way	Sacramento	CA	050-0412-008-0000
	5601/5603 Orange Avenue	Sacramento	CA	050-0412-009-0000
	7335/7337 Arleta Court	Sacramento	CA	050-0412-003-0000

1	430 W. Spain Street	Sonoma	CA	018-111-059-000
2	400 West Spain	Sonoma	CA	018-111-058-000
3	370 Butcher Rd	Vacaville	CA	127-070-310
4	280 Butcher Road	Vacaville	CA	127-070-410
5	310 Butcher Road	Vacaville	CA	127-070-300
6	312 Butcher Road	Vacaville	CA	127-431-200
7	350 Butcher Road	Vacaville	CA	127-070-030
8	7456 Foothills Blvd	Roseville	CA	477-100-031-000
9	4950 Allison Parkway	Vacaville	CA	0133-330-020
10	4960 Allison Parkway			0133-330-030
11	4970 Allison Parkway			0133-330-040
12	18935 5th St W	Sonoma	CA	127-101-018-000
13	430 West Napa	Sonoma	CA	018-193-048-000
14	446 W. Napa	Sonoma	CA	018-193-041-000
15	454 W. Napa	Sonoma	CA	018-193-040-000
16	462 W. Napa	Sonoma	CA	018-193-039
17	24160 Turkey Rd/24237 Arnold Rd.	Sonoma	CA	128-484-066-000 128-484-067-000
18	1025 Napa St	Sonoma	CA	126-032-037-000
19	900 E Napa St	Sonoma	CA	127-231-040-000
20	424 2nd St W	Sonoma	CA	018-202-002-000
21	24120 Arnold Dr	Sonoma	CA	128-461-029-000
22	525 W Napa	Sonoma	CA	018-530-054-000
23	520/530/532 Studley St	Sonoma	CA	018-530-014-000
24	18701 Gehricke Road	Sonoma	CA	127-051-073-000 127-051-074-000
25	1045 Bart Rd	Sonoma	CA	127-051-059-000
26	5818 Engle Rd	Carmichael	CA	258-0810-014
27	8340 / 8350 Auburn Boulevard	Citrus Heights	CA	204-0461-042
28	1716 Oceanfront	Del Mar	CA	299-232-09-00
	1549 E Napa St	Sonoma	CA	127-312-059-000
	476 W Spain St	Sonoma	CA	018-111-032-000
	19357 Hwy 12	Sonoma	CA	
	18590 Hwy 12	Sonoma	CA	
	18275 Hwy 12	Sonoma	CA	
	18010 Hwy 12	Sonoma	CA	
	452 1st St E #C	Sonoma	CA	018-790-003-000

1	450 1st St E #J	Sonoma	CA	018-790-018-000
2	450 1st St E #ABK	Sonoma	CA	
3	22 Boyes Blvd	Boyes Hot Springs	CA	056-402-001-000
4	414 W Napa St	Sonoma	CA	018-193-047-000
5				0080-380-020
6				0080-380-030
7	5200-5234 Gateway Plaza	Benicia	CA	0080-380-040
8	4321 1st St	Pleasanton	CA	0080-380-050
9	531-533 Camino Del Mar	Del Mar	CA	0080-380-060
10	1819 Coast Blvd	Del Mar	CA	094-0106-004-04
11	62 Farragut Ave	Piedmont	CA	300-331-14-01
12	62 Farragut Ave	Piedmont	CA	300-331-14-02
13	210 La Salle	Piedmont	CA	
14	415 Pacific Ave	Piedmont	CA	051-4700-012
15	236 King Ave	Piedmont	CA	051-4700-013
16	3200 Castle Rd	Sonoma	CA	
17	3003 Castle Rd	Sonoma	CA	
18	969 Rachel Rd	Sonoma	CA	127-540-001
19	856 4th St E	Sonoma	CA	018-381-050
20	450 1st St E #G	Sonoma	CA	018-790-016
21	405 London Way	Sonoma	CA	
22	454 15th St	Del Mar	CA	299-280-29-00
23	1834/36 Ocean Front	Del Mar	CA	
24	1745 Grand Ave	Del Mar	CA	
25	157 26th St	Del Mar	CA	
26	23105 Millerick Rd	Sonoma	CA	
27	22666 Broadway	Sonoma	CA	128-422-040-000
28	1014 1st St W	Sonoma	CA	128-083-012
	230 E Napa St	Sonoma	CA	128-222-009
	68359 Jolon Rd	Bradley	CA	423-361-005-000
	1220 E. Napa St.	Sonoma	CA	127-242-037
	19179 Railroad Ave	Sonoma	CA	052-402-023
	1200 Apple Tree Ct.	Sonoma	CA	127-242-035
	1221 Apple Tree Ct.	Sonoma	CA	127-242-033
	4896-3797-7647.1 52011.00002	27		

1	282 Patten St.	Sonoma	CA	018-262-023-000
2	320 East C Street	Dixon	CA	115-085-010
3	414 Manzanita Ave	Fairfield	CA	162-101-150
4	5120 Lovall Valley Loop Rd	Sonoma	CA	050-372-004-000
5	821 Lovall Valley Loop Rd	Sonoma	CA	127-171-012-000
6	528 Third St	Sonoma	CA	018-251-003
7	870 E. Napa St	Sonoma	CA	
8	19355 Seventh St E	Sonoma	CA	127-231-015
9	20470 Eighth St E	Sonoma	CA	
10				018-162-001
11	2 W. Spain St	Sonoma	CA	018-162-022
12	18285 Sonoma Highway	Sonoma	CA	
13	72 Moon Mountain Rd	Sonoma	CA	056-562-021-000
14	74 Moon Mountain Rd	Sonoma	CA	056-562-022-000
15	443 Casabonne Ln	Sonoma	CA	018-111-076
16	771 Fifth St E	Sonoma	CA	018-382-032
17				071-0310-009-0000
18	47 - 49 Natoma St	Folsom	CA	071-0310-001-0000
19				054-081-010
20	860 Charter Way	Redwood City	CA	054-081-140
21				0037-431-010 through
22	1 - 22 Grande Circle	Fairfield	CA	0037-431-230
23	410 Buck Avenue	Vacaville	CA	
24	2755 Baltic Drive	Fairfield	CA	0168-431-010
25	594 Lewis Court	Fairfield	CA	
26	5224 - 5226 Karm Way	Sacramento	CA	
27	2805 Yosemite Blvd	Modesto	CA	033-78-007
28	1881 Quail Meadows Circle	Vacaville	CA	
	2787 Woodmont Drive	Fairfield	CA	
	7340/7342 Arleta Ct	Sacramento	CA	050-0411-023
	7315/7317 Arleta Ct	Sacramento	CA	050-0411-011
	7336/7338 Arleta Ct	Sacramento	CA	050-0411-022
	6024 Vista Ave	Sacramento	CA	
	755 W. H St	Dixon	CA	0113-151-160
	781 Beechwood Ave	Vallejo	CA	
	9244/9246 Corinthian Cir	Sacramento	CA	
	1435 Bell St	Sacramento	CA	
	33 Village Park Square	Bluffton	SC	R16-045-000-0148
4896-3797-7647.1 52011.00002	28			

			0028-750-240
			0028-750-260
			0028-750-270
			0028-750-250
			0028-750-290
			0028-750-300
300 Chadbourne Rd	Fairfield	CA	
1995 Grande Circle	Fairfield	CA	
5959 Riverside Blvd	Sacramento	CA	029-0021-045
724 Cottonwood St	Woodland	CA	
1841 Quail Meadows Circle	Vacaville	CA	0132-041-430
1111 Alaska Avenue	Fairfield	CA	0034-011-070
			0131-030-880
			0131-030-460
555 Elmira Road	Vacaville	CA	0131-030-470
304 First St E	Sonoma	CA	018-171-030
333 E. Enos Drive	Santa Maria	CA	128-066-010
			296-103-026-3
13325 Heacock Street	Moreno Valley	CA	296-103-025-2
3515 W. San Jose Avenue	Fresno	CA	415-044-25
4727 Hackberry Lane	Carmichael	CA	230-0221-016
1118 Araquipa Court	Vacaville	CA	0127-352-340
1214 Araquipa Court	Vacaville	CA	0127-352-220
1220 Araquipa Court	Vacaville	CA	0127-352-210
1209 Araquipa Court	Vacaville	CA	0127-351-360
1226 Araquipa Court	Vacaville	CA	0127-352-200
3557 Golf View Terrace	Santa Rosa	CA	147-410-020-000
4540 St. Andrews Court	Fairfield	CA	0147-161-010
1176 Castle Road	Sonoma	CA	127-111-055
	Manhattan Beach	CA	4178-005-007
1720-1722 The Strand	Sonoma	CA	127-111-054
1170 Castle Road	Del Mar	CA	299-144-12
1823/1825 Coast Blvd	Del Mar	CA	300-231-11
721 Camino Del Mar	Del Mar	CA	299-147-05
1834/1836 Oceanfront	Napa	CA	
2052 Wilkins Ave	Malibu	CA	4469-014-012
5819 Filaree Heights	Sonoma	CA	018-860-001
432 E Napa St			

383 Oak St	El Verano	CA	052-402-011
21219 Heron Drive	Bodega Bay	CA	100-255-005
405/407 London Way	Agua Caliente	CA	056-564-023
1230 E. Napa St.	Sonoma	CA	127-242-038
834 Donner Ave	Sonoma	CA	018-363-014
2377 Lovall Valley Rd	Sonoma	CA	127-192-051
3rd St. E	Sonoma	CA	018-363-004
1300 North L Street	Lompoc	CA	089-490-01 089-490-02
7385 Greenhaven Dr	Sacramento	CA	031-0053-019
395 - 397 Coombs St			
1203 - 1219 Laurel St	Napa	CA	
2306/2376 Fairfield Ave	Fairfield	CA	
5421 Allison Way	Keyes	CA	045-066-015
7 Autumn Creek Ct	Napa	CA	046-122-016
902 Enterprise	Napa	CA	
2237/2257 Hurley Way	Sacramento	CA	285-0140-009 285-0140-032
13933 Chagall Court	Moreno Valley	CA	
20172 Northcove Square			
2605 Yuma Circle	Sacramento	CA	
1190 E. Napa St	Sonoma	CA	
456 5th St W	Sonoma	CA	018-193-035
731 5th St E	Sonoma	CA	018-382-017
904 Highway 121	Sonoma	CA	128-411-011
	Sonoma	CA	127-141-006
16581 State Highway 12	Sonoma	CA	056-562-009
141 E. Napa St	Sonoma	CA	018-261-006
908 Enterprise Way	Napa	CA	046-531-029
860 Kaiser Road	Napa	CA	046-531-040
219 Tokay Ct	Fairfield	CA	

Appendix 3 – Identified Entities

- a. Buck Avenue, L.L.C.
- b. CERES WEST MHP
- c. Commerce Court Partners
- d. Comstock Building Partners
- e. Comstock Building Partners, L.L.C.
- f. Country Oak Partners, LLC
- g. Country Oaks LP
- h. Country Oaks Partners, LLC
- i. Country Oaks Partners, L.P.
- j. Douglas Fir Investments D, LLC
- k. Folsom Village Partners
- l. Food Pavilion I, Ltd.
- m. Foothill Pine, LP
- n. Fulton Village Partners, LLC
- o. Greenhaven Partners
- p. Hood Partners LLC
- q. Jack Harouni, LLC
- r. Lassen Partners, LLC
- s. LeFever Mattson Partners Inc.
- t. Live Oak, LP
- u. LM Single Family Holdings LP
- v. KS Mattson Partners, LP
- w. McKinley Partners, LLC

4896-3797-7647.1 52011.00002

- x. Napa Elm I, LLC
- y. Napa Enterprise Partners
- z. Perris Freeway Plaza, LP
- aa. Perris Investors II, LLC
- bb. Red Hickory Tree, LP
- cc. Ringmaster's Square, LLC
- dd. Rivertree, L.P.
- ee. Specialty Properties Partners, LP
- ff. Specialty Sales Classics, Inc.
- gg. Specialty Sales Global, Inc.
- hh. The Laurel Wreath Foundation, Inc.
- ii. Treehouse Investments, LP
- jj. Treehouse Partners, LP
- kk. Vaca Villa/Butcher Road
- ll. Waters Edge Apartments
- mm. Waters Edge Riverside Properties, LLC
- nn. Windscape Apartments I D, LLC
- oo. Windscape Apartments II D, LLC
- pp. Windscape II, LLC
- qq. Wind Tree Limited Partnership
- rr. Woodcreek Plaza Partners
- ss. Woodland Oaks Investments, LLC

Appendix 4 – Identified Documents

- a. *Agreement of Butcher Road Partners*, dated as of April 28, 2010
- b. *Agreement of Co-Tenants of Commerce Court Partners*, dated as of October 10, 2014
- c. *Agreement of Co-Tenants of Country Glen Apartments*, dated as of October 1, 2006
- d. *Agreement of Co-Tenants of Country Glen Apartments*, dated as of October 31, 2006
- e. *Agreement of Co-Tenants of Folsom Village Partners*, dated as of September 30, 2013
- f. *Agreement of Co-Tenants of Folsom Village Partners*, dated as of October 1, 2013
- g. *Agreement of Co-Tenants of Fulton Village*, dated as of March 12, 2012
- h. *Agreement of Co-Tenants of Greenhaven Partners*, dated as of March 31, 2013
- i. *Agreement of Co-Tenants of Napa Elm*, dated as of July 1, 2005
- j. *Agreement of Co-Tenants of Woodcreek Plaza*, dated as of November 1, 2014
- k. *Agreement of Co-Tenants of Woodcreek Plaza Partners*, dated as of November 1, 2014
- l. *Agreement of Heacock Partner, LP*, dated as of October 1, 2013
- m. *Agreement of Limited Partners of Buck Avenue, L.L.C.*, dated as of December 2004
- n. *Agreement of Limited Partners of CERES WEST MHP*, dated as of July 31, 2007
- o. *Agreement of Limited Partners of Country Oaks, LLC*, dated as of October 15, 2007
- p. *Agreement of Limited Partners of Country Oaks Partners, LLC*, dated as of September 2007
- q. *Agreement of Limited Partners of Country Oaks Partners, LLC*, dated as of December 1, 2007
- r. *Agreement of Limited Partners of Live Oak, LP*, dated as of March 1, 2015
- s. *Agreement of Limited Partners of Perris Freeway Plaza, LLC*, dated as of December 1, 2001
- t. *Agreement of Limited Partners of Ringmasters Square, LLC*, dated as of June 25, 2004
- u. *Agreement of Limited Partners of River Birch Investments, L.P.*, dated as of June 15, 2021
- v. *Agreement of Limited Partners of Rivertree, L.P.*, dated as of September 15, 2016
- w. *Agreement of Limited Partners of Southwood Apts.*, dated as of December 5, 2005
- x. *Agreement of Limited Partners of Specialty Properties Partners, L.L.C.*, dated as of January 28, 2011
- y. *Agreement of Limited Partners of Vaca Villa/Butcher Road*
- z. *Agreement of Limited Partners of Valley Oak, L.P.*
- aa. *Agreement of Limited Partners of Waters Edge Apartments*, dated as of December 5, 2006
- bb. *Agreement of Limited Partners of Willow Glen*
- cc. *Agreement of Limited Partners of Windscape II, LLC*, dated as of October 15, 2007
- dd. *Agreement of Members of Napa Elm*, dated as of December 29, 2006
- ee. *Agreement of Napa Enterprise Partners*, dated as of November 1, 2017

- 1 ff. *Agreement of Partners of Country Oaks LP*, as amended and restated August 2016
2 gg. *Agreement of Partners of Fulton Village Partners, LLC*, dated as of March 12, 2012
3 hh. *Agreement of Partners of Perris Freeway Plaza, LP*, dated as of December 1, 2001
4 ii. *Agreement of Partners of Treehouse Partners, LP*, dated as of November 15, 2014
5 jj. *Agreement of the Limited Partners of Comstock Building Partners, L.L.C.*, dated as of
6 January 12, 2012
7 kk. *Agreement of the Partners of Comstock Building Partners*, dated as of January 12, 2012
8 ll. *Agreement of Treehouse Partners*, dated as of October 10, 2015
9 mm. *Amended and Restated Operating Agreement of Country Oaks Partners, LP* dtd
10 February 1, 2010
11 nn. *Operating Agreement of Members of Country Oaks Partners, LP*, dated as of September,
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EXHIBIT 2
Declaration of Steven W. Golden, Esq.

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*Counsel to the Official Committee
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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SANTA ROSA DIVISION**

In re:

LEFEVER MATTSON, a California
corporation, *et al.*,¹

Debtors.

Case No.: 24-10545

(Jointly Administered)

Chapter 11

**DECLARATION OF STEVEN W. GOLDEN
IN SUPPORT OF THE *EX PARTE*
APPLICATION OF THE OFFICIAL
COMMITTEE OF UNSECURED
CREDITORS FOR ENTRY OF AN ORDER
PURSUANT TO BANKRUPTCY RULE 2004
AUTHORIZING ORAL EXAMINATION OF
AND PRODUCTION OF DOCUMENTS BY
KENNETH MATTSON**

¹ The last four digits of LeFever Mattson's tax identification number are 7537. Due to the large number of debtor entities in the above-captioned chapter 11 cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://veritaglobal.net/LM>. The address for service on the Debtors is 6359 Auburn Blvd., Suite B, Citrus Heights, CA 95621.

1 I, Steven W. Golden, declare under penalty of perjury as follows:

2 1. I am a partner at the law firm of Pachulski Stang Ziehl & Jones LLP (“PSZJ”),
3 counsel to the Official Committee of Unsecured Creditors (“Committee”) in the above-captioned
4 case. My office address and phone number at PSZJ are 919 N. Market Street, 17th Floor,
5 Wilmington, DE 19801; (302) 652-4100. I am a member in good standing of the bars of New
6 York, Texas, Maryland, Pennsylvania, and Delaware.

7 2. On December 2, 2024, this Court entered an order admitting my application for
8 admission pro hac vice in this case. *See* Docket No. 395.

9 3. I submit this Declaration in support of the *EX PARTE* APPLICATION OF THE
10 OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR ENTRY OF AN ORDER
11 PURSUANT TO BANKRUPTCY RULE 2004 AUTHORIZING ORAL EXAMINATION OF AND
12 PRODUCTION OF DOCUMENTS BY KENNETH MATTSON (the “Application”) to which this
13 Declaration is appended. I have personal knowledge of the facts set forth in this Declaration unless
14 otherwise stated.

15 4. As set forth in the First-Day Declaration of Bradley Sharp, the Debtors’ Chief
16 Restructuring Officer, Mr. Mattson, one of the Debtors’ founders and former principals, “appears to
17 have used LeFever Mattson to facilitate a years-long campaign of self-serving transactions, many of
18 which were not recorded in the books and records of LeFever Mattson, the Debtor, or any of the
19 other LPs or LLCs (collectively, the “Mattson Transactions”).”² The Committee’s professionals are
20 conducting an investigation (the “Investigation”) into the Mattson Transactions (including the
21 Mattson Interest Sales and Mattson Property Sales, each as defined in the First-Day Declaration),
22 and other potential claims and causes of action that may be asserted against non-Debtors.

23 5. During the Investigation, the Committee has learned that the Debtors’ books and
24 records lack information critical to these bankruptcy cases. As set forth in the Requests, that
25 information may include emails and documents relating to the Debtors that may only be in Mr.
26

27 ² *See Declaration of Bradley D. Sharp in Support of Chapter 11 Petitions and First Day Motions* [Docket No. 5] (the
28 “First-Day Declaration”), ¶ 27.

1 Mattson's possession, custody, or control. As but one example, the Committee has learned during its
2 Investigation that Mr. Mattson used a personal hotmail.com email address – not the LeFever Mattson
3 email server and email addresses that Debtor LeFever Mattson's other employees used – to send and
4 receive business emails. As such, those emails are in Mr. Mattson's possession, custody, or control.

5 6. The Committee does not know whether Mr. Mattson has possession of other
6 information that belongs to the Debtors. The Requests seek the answer to that question. The
7 Requests are specifically directed to documents about the business operations of the Debtors in this
8 case, the real properties that the Debtors alleged own or owned; Mr. Mattson's own dealings vis-à-
9 vis the Debtors and the real properties; and his relationship with Socotra Capital, the hard money
10 lender that the Committee understands Mr. Mattson engaged to encumber real properties at the
11 expense of the investors who, based on the filed proofs of claim and interest, constitute a majority of
12 the Committee's constituency.

13 7. I provided a draft of the Requests to Mr. Mattson's counsel on March 25, 2025 in
14 order to begin a meet and confer process to clarify questions and smooth the path for Mr. Mattson's
15 document production. The Committee has not received any response as of the date hereof.

16 I declare under penalty of perjury under the laws of the United States of America that the
17 foregoing is true and correct to the best of my knowledge and belief.

18 Executed on April 1, 2025 at Wilmington, Delaware.

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20 By: /s/ Steven W. Golden
21 Steven W. Golden
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EXHIBIT 3
Proposed Form of Order Granting *Ex Parte* Application

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*Counsel to the Official Committee
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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SANTA ROSA DIVISION**

In re:

LEFEVER MATTSON, a California
corporation, *et al.*,¹

Debtors.

Case No.: 24-10545

(Jointly Administered)

Chapter 11

**ORDER GRANTING THE *EX PARTE*
APPLICATION OF THE OFFICIAL
COMMITTEE OF UNSECURED
CREDITORS FOR ENTRY OF AN ORDER
PURSUANT TO BANKRUPTCY RULE 2004
AUTHORIZING ORAL EXAMINATION OF
AND PRODUCTION OF DOCUMENTS BY
KENNETH MATTSON**

¹ The last four digits of LeFever Mattson's tax identification number are 7537. Due to the large number of debtor entities in the above-captioned chapter 11 cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://veritaglobal.net/LM>. The address for service on the Debtors is 6359 Auburn Blvd., Suite B, Citrus Heights, CA 95621.

1 Upon consideration of the *EX PARTE* APPLICATION OF THE OFFICIAL COMMITTEE
2 OF UNSECURED CREDITORS FOR ENTRY OF AN ORDER PURSUANT TO BANKRUPTCY
3 RULE 2004 AUTHORIZING ORAL EXAMINATION OF AND PRODUCTION OF
4 DOCUMENTS BY KENNETH MATTSON. (the “Application”) [Doc. No. ____], the record in this
5 case, and for good and sufficient cause appearing,

6 IT IS HEREBY ORDERED AS FOLLOWS:

- 7 1. The Application is GRANTED.
- 8 2. The Official Committee of Unsecured Creditors is authorized to issue a subpoena
9 directed to Kenneth Mattson. requiring him to (a) complete his production, by **May 14, 2025**, of
10 documents responsive to the Requests for Production (the “Requests”) set forth substantially in the
11 form attached as **Exhibit 1** to the Application; and (b) provide oral testimony on a mutually agreed
12 date no later than **June 25, 2025** (unless the Committee and Mr. Mattson agree to extend that date)
13 relating to (i) Mr. Mattson’s search for and possession, custody, or control of documents responsive
14 to the Requests; and (ii) the subject matter of the Requests.

15
16 ****END OF ORDER****
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Debra I. Grassgreen (CA Bar No. 169978)
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*Counsel to the Official Committee
of Unsecured Creditors*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SANTA ROSA DIVISION**

In re:

LEFEVER MATTSON, a California
corporation, *et al.*,¹
Debtors.

Case No.: 24-10545
(Jointly Administered)
Chapter 11

CERTIFICATE OF SERVICE

¹ The last four digits of LeFever Mattson's tax identification number are 7537. Due to the large number of debtor entities in the above-captioned chapter 11 cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://veritaglobal.net/LM>. The address for service on the Debtors is 6359 Auburn Blvd., Suite B, Citrus Heights, CA 95621.

STATE OF CALIFORNIA)
)
CITY OF LOS ANGELES)

I, Maria R. Viramontes, am employed in the city and county of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 10100 Santa Monica Blvd., 13th Floor, Los Angeles, California 90067.

On April 1, 2025, I caused to be served the **EX PARTE APPLICATION OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR ENTRY OF AN ORDER PURSUANT TO BANKRUPTCY RULE 2004 AUTHORIZING ORAL EXAMINATION OF AND PRODUCTION OF DOCUMENTS BY KENNETH MATTSON; DECLARATION OF STEVEN W. GOLDEN, ESQ.** in the manner stated below:

<input checked="checked" type="checkbox"/>	TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document was served by the court via NEF and hyperlink to the document. On April 1, 2025, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below. See Attached.
<input type="checkbox"/>	(BY MAIL) I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Los Angeles, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

I declare under penalty of perjury, under the laws of the State of California and the United States of America that the foregoing is true and correct.

Executed on April 1, 2025, at Los Angeles, California.

/s/ Maria R. Viramontes

Maria R. Viramontes

TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)

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Michael J. Gomez on behalf of Interested Party KeyBank National Association
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Jessica M. Simon on behalf of Creditor Citizens Business Bank
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Boris Smyslov on behalf of Plaintiff Mariah Driver
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Andrew B. Still on behalf of Creditor California Bank of Commerce
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Jason D. Strabo on behalf of Creditor Wilmington Trust, National Association, as Trustee for the benefit of the
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Christopher D. Sullivan on behalf of Creditor Anne and Keith Gockel
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